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## -- REMARKS --

Specification. In the Non-Final Office action, Examine Shah objected to the specification for having a typographical error. The Applicant has amended the specification herein to correct the typographical error, and no new matter was introduced by the amendment of the specification herein. Withdrawal of the objection to the specification is therefore respectfully requested.

<u>Claims</u>. In the Non-Final Office Action, Examiner Shah objected to and rejected pending claims 1-9 on various grounds. The Applicant responds to each objection and rejection as subsequently recited herein, and respectfully requests reconsideration and further examination of the present application under 37 CFR § 1.112:

**A.** Examiner Shah objected to claims 4, 5, 7 and 8 on an informal basis

The Applicant has amended claims 4, 5, 7 and 8 herein to obviate this objection to claims 4, 5, 7 and 8. Withdrawal of the objection of claims 4, 5, 7 and 8 is therefore respectfully requested.

**B**. Examiner Shah rejected claims 1, 2, 4 and 6-9 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,122,960 to *Hutchings* et al.

The Applicant has thoroughly considered Examiner Shah's remarks concerning the patentability of claims 1, 2, 4 and 6-9 over the *Hutchings*. The Applicant has also thoroughly read the *Hutchings*. To warrant this §102(b) rejection of claims 1, 2, 4 and 6-9, *Hutchings* must show each and every limitation of independent claims 1 and 7 in as complete detail as in contained independent claims 1 and 7. See, MPEP §2131. The Applicant respectfully traverses

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this §102(b) rejection of independent claims 1 and 7, because, among other things, *Hutchings* fails to show "characterized in that the processor is operable to process the sensor signals as respective vector components to produce a resultant vector within the coordinate system" in as complete detail as recited in independent claim 1, and "characterized in that the sensor signals are processed as respective vector components to produce a resultant vector within the coordinate system" in as complete detail as recited in independent claim 7.

As to the traversal, a proper understanding of *Hutchings* reveals the fact that *Hutchings* teaches processing the sensor signals as respective vector components to produce a resultant vector in a reference coordinate system that is different than the translational coordinate system from which the sensor signals are indicating motion therein. <u>See</u>, *Hutchings* at column 8, line 21 to column 9, line 6. Thus, *Hutchings* fails to teach or suggest sensor signals as respective vector components to produce a resultant vector in the translational coordinate system from which the sensor signals are indicating motion therein as required by amended independent claims 1 and 7.

Withdrawal of the rejection of independent claims 1 and 7 under 35 U.S.C. §102(b) as being anticipated by *Hutchings* is therefore respectfully requested.

Claims 2, 4 and 6 depend from independent claim 1. Therefore, dependent claims 2, 4 and 6 include all of the elements and limitations of independent claim 1. It is therefore respectfully submitted by the Applicant that dependent claims 2, 4 and 6 are allowable the *Hutchings* for at least the same reason as set forth herein with respect to independent claim 1 being allowable *Hutchings*. Withdrawal of the rejection of dependent claims 2, 4 and 6 under 35 U.S.C. §102(b) as being anticipated by *Hutchings* is therefore respectfully requested.

Claims 8 and 9 depend from independent claim 7. Therefore, dependent claims 8 and 9 include all of the elements and limitations of independent claim 7. It is therefore respectfully submitted by the Applicant that dependent claims 8 and 9 are allowable the *Hutchings* for at least the same reason as set forth herein with respect to independent claim 7 being allowable *Hutchings*. Withdrawal of the rejection of dependent claims 8 and 9 under 35 U.S.C. §102(b) as being anticipated by *Hutchings* is therefore respectfully requested.

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C. Examiner Shah rejected claim 3 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,122,960 to *Hutchings* in view of U.S. Patent No. 6,466,821 B1 to *Pianca* et al.

Claim 3 depends from independent claim 1. Therefore, dependent claim 3 includes all of the elements and limitations of independent claim 1. It is therefore respectfully submitted by the Applicant that dependent claim 3 is allowable the *Hutchings* in view of *Pianca* for at least the same reason as set forth herein with respect to independent claim 1 being allowable *Hutchings*. Withdrawal of the rejection of dependent claim 3 under 35 U.S.C. §103(a) as being unpatentable over *Hutchings* in view of *Pianca* is therefore respectfully requested.

**D.** Examiner Shah rejected claim 5 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,122,960 to *Hutchings* in view of U.S. Patent No. 6,436,052 B1 to *Nikolic* et al.

Claim 5 depends from independent claim 1. Therefore, dependent claim 5 includes all of the elements and limitations of independent claim 1. It is therefore respectfully submitted by the Applicant that dependent claim 5 is allowable the *Hutchings* in view of *Nikolic* for at least the same reason as set forth herein with respect to independent claim 1 being allowable *Hutchings*. Withdrawal of the rejection of dependent claim 5 under 35 U.S.C. §103(a) as being unpatentable over *Hutchings* in view of *Nikolic* is therefore respectfully requested.

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## **SUMMARY**

The Applicant respectfully submits that claims 1-9 fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested. If any points remain in issue that may best be resolved through a personal or telephonic interview, Examiner Shah is respectfully requested to contact the undersigned at the telephone number listed below.

Dated: **July 27, 2006** 

Respectfully submitted, Gillian Antoinette Mimnagh-Kelleher et al.

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